

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.

DAMETRIS SAMUELS

*Defendant(s)*Case No. **1:23-MJ-00730**

CRIMINAL COMPLAINT

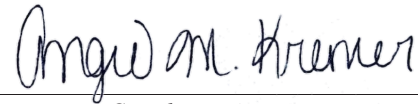
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 1 - August 24, 2023 in the county of Hamilton in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 371	Conspiracy to Commit Mail Theft
18 U.S.C. 1704	Illegal possession of a Mail Key
18 U.S.C. 1708	Theft of Mail Matter Generally
18 U.S.C.	Bank Fraud

This criminal complaint is based on these facts:

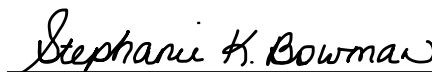
See Affidavit

☒ Continued on the attached sheet.*Complainant's signature*

Angie Kremer, Postal Inspector, USPIS

Printed name and title

Sworn to before me and signed in my presence by reliable electronic means, specifically, FaceTime video conference.

Date: Sep 7, 2023*Judge's signature*City and state: Cincinnati, Ohio

Hon. Stephanie K. Bowman, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
A COMPLAINT AGAINST DAMETRIS SAMUELS**

I, Angie Kremer, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a Complaint against DAMETRIS SAMUELS (“SAMUELS”) for violations of 18 U.S.C. § 371 (Conspiracy), 18 U.S.C. § 1708 (Theft of Mail), 18 U.S.C. § 1704 (illegal possession of USPS mail key), and 18 U.S.C. § 1344 (Bank Fraud).

2. I am a United States Postal Inspector, having been so employed since June 1, 2013. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. I have gained experience through completion of the Basic Inspector Training (BIT) in August of 2013. During BIT training, I was instructed in all phases of criminal investigation, such as criminal law, search and seizure, field enforcement techniques, firearms proficiency, drug and narcotics identification, drug and narcotics field testing, interviewing and evidence collection. Since August 2013 I have worked with various federal, state, and local law enforcement agencies in the prosecution of crimes involving the U.S. Mail and the U.S. Postal Service including but not limited to mail fraud, bank fraud, mail theft, burglaries, robberies, homicides, dangerous mail investigations, and mailed narcotics.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, witnesses, and information published by Meta. This affidavit is intended to show merely that there is sufficient probable cause for the requested Complaint and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. The United States, including the United States Postal Inspection Service (USPIS), is conducting a criminal investigation of DAMETRIS SAMUELS, and others regarding possible violations of 18 U.S.C. § 371 (Conspiracy), 18 U.S.C. § 1708 (Theft of Mail), 18 U.S.C. § 1704 (illegal possession of USPS mail key), and 18 U.S.C. § 1344 (Bank Fraud).

TACTICS USED IN MAIL THEFT

5. Based on your Affiant's training and experience involving other criminal investigations of mail theft and identity theft, together with the knowledge given to me by other law enforcement personnel and other law enforcement agents, your Affiant knows:

- a. Persons use the U.S. Postal Service (USPS) to send various types of mail. First class mail is the most common type of mail sent by consumers via stamp and envelope. Some of the most common items sent in first-class mail by USPS customers are checks. As a result, criminals routinely target USPS first class mail to steal checks for the purpose of altering them and depositing them at financial institutions. Often, first-class mail is sent by USPS customers by placing an envelope with a stamp into a USPS blue mail collection box located on the street or in front of a post office. Criminals typically use one (1) of three (3) methods to steal these checks from USPS blue mail collection boxes. The first method is the use of a stolen proprietary USPS key which opens these boxes, commonly referred to as an "Arrow Key." These Arrow Keys are only used by the USPS and it is a federal offense for an unauthorized person to possess one. The second method is by picking the lock, either using a counterfeit Arrow Key or other burglary tools. The third method is referred to as "fishing." Fishing is done by placing a weighted object (typically a

block or bottle) covered in a sticky substance and attached to a string into the collection slot and then pulling it out via that string with any attached envelopes. In cases where personal checks are stolen, the pen ink is often removed by criminals in a process called “washing” and then re-written into the name of a person who deposits the altered check into their checking account. Persons who engage in this deposit activity are known as money mules.

- b. Checks are commonly washed by using a chemical, specifically, acetone (nail polish remover) to wash away the pen ink used to write information on a check without damaging the check or its higher quality ink. Other methods include using razor blades or erasers to remove the ink, although these methods will typically damage the check more than an effectively executed chemical washing. The criminal will then add unauthorized information on the check so it can be deposited into a money mule’s account. This is be done by hand or via printer. Sometimes the check’s information will also be saved (either in a ledger, electronic device, or electronic storage media) to enable the creation of counterfeit checks which are printed using a computer, printer and blank check stock.
- c. Once the check has been washed and re-written, the recruiter will co-ordinate with the mule to have the check placed into the mule’s account. If the forgery is not detected by the bank and funds are credited to the mule’s account, the money is then removed from the bank account via transfer, purchases, or cash withdrawals before the check’s alteration is noticed, the bank alerted, and the charges reversed. Business checks are often altered in a similar manner, however sometimes the depositor will instead falsely endorse the check to his/herself without altering the checks face.

Money mules and those they work for often use mobile deposits for these checks, because it is believed the computers that approve checks deposited by mobile application are less likely to detect alteration than a person. The person who recruits money mules into the schemes are referred to as recruiters.

- d. Individuals involved in check fraud, credit card theft, credit card fraud and identity theft offenses frequently keep evidence associated with their activities in their residences, vehicles, and places of business. These can include records of items improperly taken and/or received, records of transactions, information identifying victims, accomplices or co-conspirators, and records listing and/or identifying the nature and location of the proceeds of unlawful activity. They will also store materials in multiple locations and maintain multiple residential and/or business addresses and/or vehicles to avoid discovery and apprehension.
- e. Based on my training and experience, individuals engaged in these offenses often possess and/or maintain firearms, stolen checks, materials discarded from stolen mail, check-washing substances, proceeds of the fraud in their vehicles and at their residence(s).

MAIL THEFT BY DAMETRIS SAMUELS AND OTHERS

6. Beginning on or around June 2023, Inspectors received notification that a large volume of checks were being stolen from the blue USPS collection boxes near 366 Anderson Ferry Road, Cincinnati, OH 45238. Inspectors gathered intelligence that these blue USPS collection boxes were being accessed with unlawfully possessed USPS arrow keys and the mailed contents within were being removed. This location consists of four blue collection boxes near a company called Bearcat Storage (hereinafter referred to as the “Delhi blue boxes”).

7. Through the use of video surveillance cameras, USPIS has captured video of multiple individuals who have stolen mail from the Delhi blue boxes. In each of those instances, the individuals insert a USPS arrow key into the collection boxes, open the boxes, and steal the mail. This pattern shows that the individuals stealing from the Delhi blue boxes have illegally obtained possession of a USPS arrow key.

8. Surveillance videos from the Delhi blue boxes shows numerous occasions where an unmasked black male (identified as DAMETRIS SAMUELS) with distinctive tattoos on both arms participated in the theft of mail. The instances are described below.

July 1, 2023 at 1:52 AM

9. On or about July 1, 2023 at 1:52am, Inspectors observed on surveillance footage an unidentified male using a USPS arrow key to open all four blue collection boxes at 366 Anderson Ferry Road. According to the footage, this unmasked male was wearing a t-shirt which allowed for his numerous and distinct arm tattoos to be observed on both his right and left forearms and biceps. The male remained in the area conducting theft from the collection boxes until approximately 1:57am. He removed and stole mail contents from the four collection boxes, as well as three white USPS mail tubs.

10. Still photos of the surveillance video from the mail theft on July 1, 2023 are shown below:





11. Using the surveillance images from the theft incident on July 1, 2023 (depicted above), Inspectors coordinated with other law enforcement officers and identified the suspect as DAMETRIS LADON SAMUELS.

12. Upon reviewing Hamilton County Sheriff's Office Identification Unit records of Samuel's tattoos (shown below), Inspectors were able to match several tattoos from the surveillance images to the ones previously documented in Samuel's identification records. For example, see below:

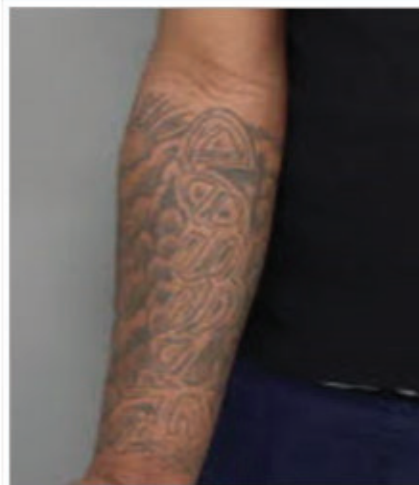
Surveillance Image from theft incident on July 1, 2023



Images provided by Hamilton County Sheriff's Office of Dametris Samuels' tattoos:



Left forearm: Destiniy



Right forearm: Blessed

July 18-19, 2023 from 11:58 PM through 12:09 AM

13. On or about July 18, 2023 at approximately 11:58pm, surveillance footage showed SAMUELS in a t-shirt with his tattoos visible using a USPS arrow key to steal mail from the Delhi blue collection boxes. Surveillance footage showed a sedan travel the wrong way in the driveway alongside the blue USPS collection boxes. The driver of the vehicle remained seated inside while the passenger, SAMUELS exited and opened one blue collection box using a USPS arrow key. SAMUELS is observed removing the white mail tub from within the blue box and closing and locking the box door. SAMUELS enters the vehicle and the vehicle departs the area. At approximately 12:09am (now on July 19, 2023) the same sedan drives up to the blue USPS collection boxes and SAMUELS wearing a t-shirt with visible arm tattoos, is observed at the Delhi blue collection boxes using a key to open and retrieve the contents from within a second collection box at this location.

August 5, 2023 at 12:05 AM

14. On or about August 5, 2023 at approximately 12:06am, surveillance footage showed SAMUELS, in a t-shirt with the tattoos visible on his arms, using a USPS arrow key to steal mail from the Delhi blue collection boxes at 366 Anderson Ferry Road. An additional unmasked male is seen assisting SAMUELS with removing the mail tubs. Surveillance footage showed a light colored 4 door sedan, possibly a BMW, travel the wrong way in the driveway alongside the blue boxes. The front seat passenger and the rear passenger (SAMUELS) are seen exiting in the direction of the blue USPS collection boxes. Surveillance footage showed SAMUELS use a key to gain entry to all four collection boxes at this location. SAMUELS is seen opening the box, removing the mail tub, and handing it to his accomplice.

15. Below are photos from the August 5, 2023 mail theft at the Delhi blue boxes:



August 7, 2023 at 11:33 PM

16. On or about August 7, 2023 at approximately 11:33pm, surveillance footage showed Dametris Samuels using a USPS arrow key to steal mail from the blue USPS collection boxes at 366 Anderson Ferry Road. Inspectors have previously identified Samuels in other mail theft surveillance at this location by his tattoos. An additional unidentified person is observed on surveillance video assisting Samuels with the theft, but the only distinguishing feature that can be garnered on this subject are his pants, which have straps near the thigh area. Samuels is seen using a USPS arrow key to unlock and open all four collection boxes. He removes the white mail tubs which are collected and carried away by his accomplice.



August 10, 2023 at 1:38 AM and 3:34 AM

17. On or about August 10, 2023 at approximately 1:38am, surveillance footage showed SAMUELS, wearing a t-shirt with his arm tattoos visible, using a USPS arrow key to steal mail from the Delhi blue USPS collection boxes at 366 Anderson Ferry Road. An additional unmasked male, wearing distinct pants with reflective stripes down the shin area and straps near the thigh area, is seen with SAMUELS as he removes the mail tub. (An unidentified individual wearing these same pants is observed assisting SAMUELS conduct mail theft at this location on August 7, 2023 at approximately 11:33pm.) Surveillance footage showed SAMUELS use a USPS arrow key to open one blue collection box and remove the mail tub at 1:38am. He shuts and locks the collection box before he and his accomplice depart.



18. No activity is seen at the Delhi blue collection boxes until 3:34 AM when the male wearing the distinct pants with reflective stripes down the shin area and straps near the thigh area is observed using a USPS arrow key to gain access to the remaining three collection boxes that had not been previously opened at 1:38 AM by SAMUELS. The male removed the white USPS mail collection tubs from the boxes and exited the area.

August 24, 2023 at 12:11 AM

19. On or about August 24, 2023 at approximately 12:11am, surveillance footage showed SAMUELS, wearing a t-shirt with his arm tattoos visible, using a USPS arrow key to steal mail from the Delhi blue USPS collection boxes at 366 Anderson Ferry Road. SAMUELS is seen working with an accomplice, who can only be observed by reflective stripes on their athletic style shoes. SAMUELS is observed using a USPS arrow key to unlock and open all four collection boxes. He removes the white USPS mail tubs and his accomplice carries them away. Shortly after SAMUELS is seen closing and locking the fourth collection box, the tail lights of what appears to be a Dodge sedan is seen exiting the area of the collection boxes and traveling down Anderson Ferry Road toward River Road.



Additional Information Regarding SAMUELS' Bank Fraud Activity

20. During the investigation, USPIS and local law enforcement identified checks that were reported as stolen from the mail at the Delhi blue boxes. The victim company reported that it had mailed multiple checks at the Delhi blue boxes on or about June 20, 2023. None of these checks were ever received by the intended recipient. However, four fraudulently produced checks were negotiated from the account of this victim company. Two of the stolen checks were altered, deposited and cashed on or about June 26, 2023 in the Cincinnati area. Two other checks were altered and cashed on or about July 7, 2023 outside the State of Ohio. Chase Bank provided images of two individuals cashing the checks. One of the individuals matches the physical description and appears to be SAMUELS.





21. During the investigation, USPIS and local law enforcement identified checks that were reported as stolen from the mail at the Delhi blue boxes. A victim reported mailing a check in the amount of \$57.54 to Dillard's on or about June 30, 2023 at the Delhi blue collection boxes alongside Anderson Ferry Road. The check was stolen, and altered to the amount of \$9,700.00, and deposited on or about July 3, 2023 in the Cincinnati area. Chase Bank provided images of

the individual depositing the check, who matches the physical description of and appears to be SAMUELS.



22. Furthermore, on or about June 5, 2023, USPIS was notified that a postal manager had recovered what appeared to be discarded and/or stolen mail in a wooded area near Hill Street and Martin Street in Cincinnati, Ohio. Upon contacting the senders of the recovered mail, one of the victims reported that he had mailed a debit card back to his mother utilizing a USPS blue

collection box in the Cincinnati area, but the mailed bank card never reached her and was stolen. Upon further investigation, the stolen debit card was used to make two purchase attempts at Target, both of which were declined. Video of the transaction shows that the individuals that attempted to use the stolen debit card appear to be DAMETRIS SAMUELS and another person.



23. Based on the information in this affidavit, I request that a Complaint be issued against DAMETRIS SAMUELS ("SAMUELS") for the following violations:

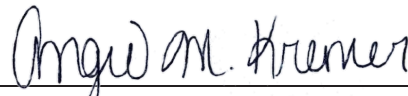
Count 1 - 18 U.S.C. § 371 (Conspiracy to Commit Mail Theft);

Count 2 - 18 U.S.C. § 1704 (Illegal possession of USPS mail key);

Counts 3-9 - 18 U.S.C. § 1708 (Theft of Mail) related to the 6 dates described above; and

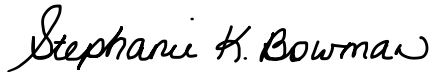
Count 10 - 18 U.S.C. § 1344 (Bank Fraud).

Respectfully submitted,



Angie Kremer, Inspector
United States Postal Inspection Service

Subscribed and sworn to before by reliable electronic means, specifically, FaceTime video conference, on September 7th, 2023.



HONORABLE STEPHANIE K. BOWMAN
UNITED STATES MAGISTRATE JUDGE

